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FEDERAL COMMUNICATIONS COMMISSION
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
The Use of N11 Codes and Other Abbreviated Dialing Arrangements	)	CC Docket No. 92-105

COMMENTS OF THE BELL ATLANTIC TELEPHONE COMPANIES

The Bell Atlantic telephone companies[1] agree that the use of N11 codes for dialing enhanced service providers could serve the public interest. Allocating an entire code for the exclusive use of a single ESP, however, will immediately exhaust the available codes without accommodating all the entities that want them.

Bell Atlantic, therefore, urges the Commission not to allow exchange carriers to assign all available N11 codes to individual ESPs and that it set aside two N11 codes for nationwide "gateways" or other similar arrangements. This would extend the benefits of three-digit dialing to as many competitors -- and consumers -- as possible.

Finally, the Commission's rules should explicitly define the rights and obligations of the ESPs and the exchange carriers. Without a clear directive from the Commission, there will surely be further time-consuming and costly disputes, both before the Commission and the courts.

[1] The Bell Atlantic telephone companies are The Bell Telephone Company of Pennsylvania, the four Chesapeake and Potomac telephone companies, the Diamond State Telephone Company and the New Jersey Telephone Company.

1. The Commission Should Encourage Arrangements That Permit the Broad, Efficient Use of N11 Dialing.

The assignment of an N11 code for the exclusive use of a single ESP is not an optimal use of that resource. The number of entities requesting codes is sure to exceed the supply. Although there are at most four N11 codes available throughout the country,[2] in the three months since this controversy developed, Bell Atlantic alone has already received eight requests from ESPs for abbreviated dialing arrangements.

The NPRM asks whether technology offers any solutions to the problems posed by the scarcity of N11 codes.[3] Bell Atlantic believes that it does.

The most promising solution is offered by advanced intelligent network (AIN) technology, which will be available to nearly all of Bell Atlantic's customers by mid-1993. Bell Atlantic is actively pursuing an access method that will make one or two N11 codes three-digit "gateways" to the services of hundreds, or even thousands, of enhanced service providers.

With AIN technology, an end user's call to an N11 gateway would trigger a database lookup to associate the calling party's telephone number with his chosen ESPs. If the customer has selected only one ESP, the call will be connected to that ESP. If

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[2] Only four N11 codes (211, 311, 511 and 711) are available nationwide because they have not been assigned for specific applications by the North American Numbering Plan Administrator ("NANPA"). Other codes might be available in some areas because they are not being used for the purpose for which the NANPA assigned them.

[3] NPRM ¶ 16.

the caller has programmed a menu of preferred ESPs, a tone or other prompt will tell the caller to select an ESP from the menu by dialing an additional digit. Casual users can reach ESPs by dialing the N11 number and waiting for a prompt, or by dialing a separate casual users' gateway reached through a second N11 number. The same N11 numbers can be used for access to voice, data and video applications.

The AIN gateway would be available to all ESPs (including Bell Atlantic's own enhanced services) on the same terms and conditions.[4] Unlike the one-code-per-entity approach that permits a maximum of four ESPs to offer three-digit dialing in each local area, the gateway promotes competition by accommodating a virtually unlimited number of ESPs. And the AIN service promotes efficient use of the network by leaving other N11 codes free for other uses established by the NANPA.

The Commission's rules should encourage exchange carriers to implement such gateways rather than to assign codes for the use of individual ESPs. To accomplish this, the Commission should set aside one or two N11 codes as national information service gateway numbers -- much as 411 and 911 are uniformly used to reach directory assistance and emergency services throughout the country

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[4] In response to the Commission's question, Bell Atlantic does not plan to have customers reach any of its own enhanced services by dialing 411.

today.[5] Exchange carriers providing N11 gateways should not be permitted to assign N11 codes to individual ESPs.

If an exchange carrier does not offer an N11 gateway, it may assign the non-gateway codes to individual ESPs. However, the NANPA might need to reclaim these codes for use as NPAs or national service codes.[6] If the Commission permits the assignment of N11 codes, it should make it clear that the codes must be returned upon the NANPA's request without the bickering and litigation that so often characterize this industry. Bell Atlantic sees no particular benefit in making these numbers, unlike any other telephone number, transferrable by the assignee.

Gateways meet the needs of the ESPs better than the proposal for allocating codes to different ESPs in different areas. Many ESPs operate in different cities and will want their customers to be able to reach them through identical dialing arrangements everywhere. For example, an ESP recently sent a request for three-digit access jointly to Bell Atlantic, New York Telephone and Southern New England Telephone and asked all three companies to assign it the same N11 code.[7] Other ESPs will surely want

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[5] If an exchange carrier is not in a position to implement an N11 gateway in the near future, it could assign N11 codes to individual ESPs conditionally, subject to the ESPs' agreement to relinquish the codes for use for a gateway.

[6] The NANPA should not recall the gateway N11 codes until after any codes assigned to individual ESPs have been relinquished.

[7] Bell Atlantic is not identifying the ESP because it does not know whether that entity wants its plans publicly known.

regional, if not national, codes. Their needs can be accommodated through Bell Atlantic's gateway proposal.

2. The Alternatives Proposed in the Notice Should Not Be Adopted.

The alternatives to N11 dialing mentioned in the NPRM could be implemented, but would cause problems not found with N11 codes. For example, local exchange carrier switches are already programmed to handle calls dialed in the N11 format. However, switches would have to be re-programmed for any three-digit numbers in formats other than N11.

In addition, each non-N11 number used for ESP access would eliminate a possible area code (NPA), central office code (NXX) or service access code (SAC) -- potentially foreclosing the assignment of millions of telephone numbers. While the number of available three-digit codes will increase in 1995 with the full implementation of interchangeable NPAs, this increase is not a reason to begin to use numbering resources unwisely or inefficiently. If the present North American Numbering Plan is going to see the industry through the early part of the next century, without the need to reconfigure the network again and adopt a more cumbersome dialing plan, regulators and the industry must be watchful of squandering the apparent bounty interchangeable NPAs will afford.

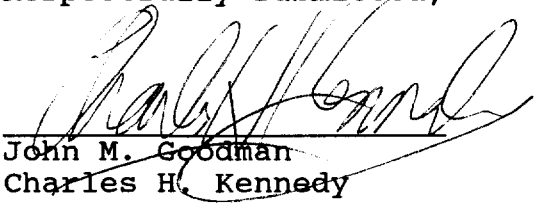
Use of "*" and "#" signs with two- or three-digit numbers also presents problems. First, of course, dialing with a "#" sign would not be universal because it could not be done from the

millions of rotary telephones still in service. Second, "*" and "#" are used today only to activate switch capabilities, not for customer dialing. To change this would require software modifications from switch manufacturers, which typically take at least two years after the requirements have been defined. Finally, these numbers would likely cause customer confusion because codes in the *XX format are used today to allow customers to activate network features. For example, *67 is the "privacy indicator" that blocks the delivery of Caller ID, and *72 activates call forwarding.

Conclusion

Assigning N11 codes to individual ESPs can provide the three-digit dialing some ESPs want. However, it is not an efficient use of this limited resource. Bell Atlantic urges the Commission to encourage instead the deployment of exchange carrier N11 gateways which can provide the benefits of abbreviated dialing to many ESPs.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Comments of the Bell Atlantic Telephone Companies" was served this 5th day of June, 1992, by delivery thereof by first class mail, postage prepaid, to the parties on the attached list.

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